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**ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

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Jane Dee Hull  
Governor

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Director

October 17, 2002

**WIA GUIDANCE LETTER #17-02**

**SUBJECT:** Policy Clarifications – Youth Program

**REFERENCE:** P.L. 105-220, §129 (a)(1) and (c)(1)(A)(B) of the Workforce Investment Act (WIA) of 1998; 20 CFR Part 652 et al., §664.205, 664.310, and 664.405(a)(1)(2)(3), WIA Final Rule dated August 11, 2000

**BACKGROUND:** During June and July 2002, the Department of Labor (DOL) Region 6 representatives conducted a comprehensive review of WIA programmatic and fiscal practices at both the state and local level. The information below was provided by DOL, based upon local area requests for clarification concerning the administration of youth programs.

- Q:** Is a positive skill attainment in basic skills defined as a grade level gain for language, reading, and/or computation, OR work readiness, OR occupational skills?
- A:** Within WIA regulations, there is no standard that determines to what degree a measure should be increased to count as a positive outcome. ***However, under Arizona's Skill Attainment System, a youth's progress toward a basic skills goal is measured in terms of the grade level(s) a youth attains within a program year.*** Achievement of a basic skills goal is demonstrated through a variety of assessment instruments. They include, but are not limited to, the Test of Adult Basic Education (TABE), the Stanford 9, and/or a state-approved English for Speakers of Other Languages (ESOL) test used by a local area or its service provider.

Achievement of work readiness and occupational skills goals is defined in terms of proficiency. ***Proficiency*** is defined as achieving a certain level (%) of specific skills or behaviors relevant to employment, that are pre-assessed and post-assessed according to guidelines in the Skill Attainment System. Goals for basic skills, work readiness or occupational skills, must represent skill levels that are meaningful and challenging, yet realistic and attainable.

- Q:** Is it allowable to exit a younger youth who attains a diploma and then re-register the youth as an older youth for further services? How does that affect follow-ups?
- A:** While there is nothing in the regulations that prevents a local area from employing this strategy, the intention of WIA is that the needs of a young person should drive how a

youth is served, not performance outcomes. Needed follow-up services are provided to all youth who exit. If a youth re-registers prior to 12 months, follow-up services would discontinue at that point and full services, based on the individual service strategy (ISS) would be provided.

Youth should be provided a continuum of services based on their needs and their ISS. In addition to the significant reporting challenge, the strategy described in the question above would present the potential loss of the continuity of service to the youth, leading to a decreased retention rate. Furthermore, additional documentation would be required to re-establish eligibility (e.g. selective service documentation for males who turned 18 while being served as younger youth, as well as updated income information for these youth.)

**Q:** Are GED seeking students defined as being in school or out-of-school?

**A:** It depends on the local definition of “alternative school”. The state allows local flexibility in defining “alternative school” and determining what programs of study might be excluded from the definition. Examples of such alternative programs could include GED, skills training, or other remedial education programs offered by a community-based organization. Once “alternative school” is defined at the local level, it may result in youth attending such community-based programs as being classified as out-of-school because these programs would not fall under the local definition of “alternative school”. Definition at the local level should not be inconsistent with the Act, the regulations, other federal statutes and regulations governing One-Stop partner programs, or state/local education policies.

**ACTION REQUIRED:** Each Local Workforce Investment Area (LWIA) should define “alternative school” in order to maximize the provision of WIA services to youth eligible for assistance through alternative education programs. Please distribute this information to all those responsible for administering WIA youth programs, as well as members of the Youth Council in your LWIA.

If you have any questions, please contact Ms. Mary Ann Dunleavy, Program and Project Specialist, at (602) 364-2483.

Sincerely,

Stan Flowers  
Program Administrator (Actg)  
Workforce Development Administration

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